

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

IN RE:	:	
DARLENE ROSE SHAFFER	:	BK. No. 1:19-bk-02978-HWV
MARK EDWARD SHAFFER	:	
Debtors	:	Chapter No. 13
	:	
FREEDOM MORTGAGE CORPORATION	:	
Movant	:	
	:	
v.	:	
DARLENE ROSE SHAFFER	:	11 U.S.C. §362
MARK EDWARD SHAFFER	:	
Respondents	:	

**ANSWER TO MOTION OF FREEDOM MORTGAGE CORPORATION FOR
RELIEF FROM AUTOMATIC STAY§362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

AND NOW, this 21st day of October 2019, the Debtors, by and through their attorney, Dawn M. Cutaia, file this Answer and in support thereof state the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Debtors are curing the arrears – both pre-petition and post-petition – in their Plan.
5. Admitted.
6. Denied. Debtors' Plan specifically states that the first two post-petition mortgage payments will be paid through the Plan and that all future payments will be conduit payments. Furthermore, Movant, through a different law firm, filed an Objection to Debtors' Plan, based solely on the fact that the pre-petition arrears were slightly

understated and no objection was made as to the post-petition arrears or the fact that it was a conduit Plan. Debtor's first conduit payment would be the October 2019 payment and since it isn't the end of October yet, it is not possible for Debtors to be late on that payment. As of October 21, 2019, Debtors have paid \$3,390.15 to the Trustee and are not delinquent with their Trustee payment.

7. Denied.
8. This is a request for relief more appropriately placed in a Wherefore Clause, not an averment of fact, but Counsel for Debtor has no objection to this request for relief.
9. Denied.
10. Denied.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion for Relief.

Respectfully Submitted:
/s/ Dawn M. Cutaia
Attorney for Debtors
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